

EXHIBIT A

From: Rick Singer [REDACTED]
Sent: Thursday, April 12, 2018 12:40 AM
To: Devin Sloane <[REDACTED]>; Devin Sloane <[REDACTED]>
Subject: Fwd: RE:

I received a call from Coach Vavic last night asking why [REDACTED] is pushing back on my decision to take [REDACTED] as a member of my team - WHY?

[REDACTED] is strong enough student to compete as a student-athlete and be a positive role model for our program throughout USC - again WHY are they questioning??

Head Water Polo Coach-- Jovan Vavic and [REDACTED] his wife have become family friend for several years since [REDACTED] has participated in Water Polo in the summers while we were in Italy

Coach Vavic goes to Serbia, Greece, Italy, Spain and Portugal with his college teams to train and recruit players to bring to the US; consequently, we have created a close relationship.

Coach Vavic knows [REDACTED] very well and realizes he is not at the National Level of USC as a water polo player but he encouraged us to have [REDACTED] consider attending USC and being a part of his team

Coach Vavic stated to us that he has 40-50 guys on his team annually. Only a couple handful play but he needs practice players and great teammates plus he knows we are a generous family.

----- Forwarded message -----

From: Donna Heinel <[REDACTED]>
Date: Wed, Apr 11, 2018 at 7:38 PM
Subject: Fwd: RE:
To: [REDACTED]

Here you go.....

Sent from my iPhone

Begin forwarded message:

From: Kirk Brennan <[REDACTED]>
Date: April 11, 2018 at 6:19:53 PM PDT
To: Donna Heinel [REDACTED]
Subject: RE:

Thanks, for this. If you don't mind, I'll pass an edited/paraphrased version of your note along to the school, to assure them we're looking at this stuff. They seemed unusually skeptical. I think they do have a water polo team, but I wouldn't expect it to be competitive. It's a small school; I read a good deal about tennis, some basketball, but not much else in the way of athletics.

K

From: Donna Heinel
Sent: Wednesday, April 11, 2018 2:19 PM
To: Kirk Brennan <[REDACTED]>
Subject:

Kirk,

Wanted to complete the loop. [REDACTED] doesn't play on the men's water polo team at [REDACTED] because they do not sponsor water polo at his school. He plays at [REDACTED] during the year and travels international during the summer with the youth junior team in Italy. I don't know if the people at [REDACTED] are unaware of his participation. He participates in tournaments in Greece, Serbia (how he met Jovan) and Portugal. I believe the parents do have money since he is enrolled in [REDACTED] plus is able to travel so extensively during the summer. He is small but he has a long torso but short strong legs plus he is fast which helps him win the draws to start play after goals are scored. He is an attack perimeter player. Thanks for bring to my attention.

Donna C. Heinel Ed.D

Senior Associate Athletic Director/SWA

Associate Professor-Rossier School of Education

University of Southern California

CONFIDENTIALITY NOTICE: This communication and any documents, files, or previous e-mail messages attached to it, constitute an electronic communication within the scope of the Electronic Communication Privacy Act, 18 USCA 2510. This communication may contain non-public, confidential, or legally privileged information intended for the sole use of the designated recipient(s). The unlawful interception, use, or disclosure of such information is strictly prohibited under 18 USCA 2511 and any applicable laws.

EXHIBIT B

(UNDER SEAL)

EXHIBIT C

(UNDER SEAL)

EXHIBIT D

2019-01-02 22-15-28 13889-001

Page 1

1 **Call Date:** 2019-01-02

2 **Call Duration:** 4:32

3 **Call Begin [] Call End []**

4 **Call Participants:**

5 Rick Singer

6 Jovan Vavic

7 **File Name:** 2019-01-02 22-15-28 13889-001

8 **Bates No.:**

9

10 VAVIC: [00:00] Hello?

11 SINGER: Jovan. Rick Singer. How are ya?

12 VAVIC: Rick! I'm doing very good. How are you doing?

13 SINGER: Good. Congratulations, uh, belated, on beatin'

14 Stanford.

15 VAVIC: That's right. Thank you, very much.

16 SINGER: Uh...

17 VAVIC: It was, uh...

18 SINGER: Huge. That was huge!

19 VAVIC: Yeah. You know, after -- after 4 years of

20 frustration with the boys, we finally did it.

21 SINGER: Yeah. Oh, uh, and John thought this was his year.

22 So, uh, uh...

23 VAVIC: Yeah, he did. He did.

24 SINGER: Uh, you guys did a great job.

2019-01-02 22-15-28 13889-001

Page 3

1 obviously, I've been able to go through Donna, uh, to g--
2 to help us with getting some kids in. But if I come
3 across somebody that's a water polo player --

4 VAVIC: Uh...

5 SINGER: -- 'cause I know that's what, uh, y-- they have to
6 be a water polo player, for you -- uh, then, uh, uh, it's
7 still OK for [02:00] me to holler at you, because --
8 essentially, what we've done in the past, with the
9 scholarships for your boys. Correct?

10 VAVIC: Absolutely. Absolu--ly.

11 SINGER: OK. But I know that th--

12 VAVIC: Uh, so, uh, we jus-- we just have to find the right
13 person. And he has to be... Because the -- the way SC's
14 now doing everything, Rick, is, uh, uh, uh, when you get
15 a walk-on... Uh, I used to be able to get 'em in much
16 easier. Now the walk-on, uh, is required to have decent
17 grades. And he has to have some kind of a resume. He
18 can't be just a to-total nobody.

19 SINGER: Got it.

20 VAVIC: So he has to be a water polo player. He has to have
21 a -- a somewhat decent, uh, resume, and maybe, you know,
22 3rd team all-CIF, uh, you know, 4th or 5th team all-
23 American, you know, something that -- th-that I can show
24 that this guy's a legit -- or girl is a legit player.